

The Honorable Kymberly K. Evanson

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
EDUCATION, et al.,

Defendants.

NO. 2:25-cv-01228-KKE

SECOND SUPPLEMENTAL
DECLARATION OF ELLEN
RANGE IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION

I, Ellen Range, declare:

1. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge. I am one of the attorneys representing Plaintiff State of Washington in the above-captioned matter.

2. I submit this supplemental declaration in support of Plaintiffs' Motion for Preliminary Injunction.

3. The facts set forth herein are based upon my personal knowledge of a review of the files in my possession.

4. Yesterday, the U.S. Department of Education (the Department) announced its grant competition for its Mental Health Service Professional Demonstration Grant Program and the School-Based Mental Health Services Grant Program in the Federal Register. For both

1 programs, the Department is inviting applications from September 29, 2025, through
2 October 29, 2025. Priorities for these competitions apply to “FY 2025 and any subsequent year
3 in which we make awards from the list of unfunded applications from this competition.”

4 5. Attached as **Attachment A** is a true and correct copy of the Federal Register,
5 Vol. 90, No. 186, dated September 29, 2025, titled Department of Education, Applications for
6 New Awards; Mental Health Service Professional Demonstration Grant Program.

7 6. Attached as **Attachment B** is a true and correct copy of the Federal Register,
8 Vol. 90, No. 186, dated September 29, 2025, titled Department of Education, Applications for
9 New Awards; School-Based Mental Health Services Grant Program.

10 I declare under penalty of perjury under the laws of the State of Washington and the
11 United States of America that the foregoing is true and correct.

12 DATED this 30th day of September 2025 at Olympia, Washington.

13
14 /s/ Ellen Range

ELLEN RANGE, WSBA #51334
Assistant Attorney General